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Attorney for CHRISTOPHER J. HADNAGY and  
SOCIAL-ENGINEER, LLC

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

CHRISTOPHER J. HADNAGY, an individual; and SOCIAL-ENGINEER, LLC, a Pennsylvania limited liability company,

Plaintiffs,

V.

JEFF MOSS, an individual; DEF CON COMMUNICATIONS, INC., a Washington corporation; and DOES 1-10; and ROE ENTITIES 1-10, inclusive.

## Defendants.

Case No.: 2:23-cv-01345-CDS-BNW

**DECLARATION OF KRISTOFER  
RIKLIS, ESQ. IN SUPPORT OF  
PLAINTIFFS' RESPONSE IN  
OPPOSITION TO DEFENDANTS'  
MOTION TO TRANSFER VENUE [ECF  
NO. 15]**

1 **DECLARATION OF KRISTOFER RIKLIS, ESQ. IN SUPPORT OF PLAINTIFFS'**  
2 **RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO TRANSFER VENUE**  
3 **[ECF NO. 15]**

4 I, Kristofer Riklis, Esq., declare as follows:

5 1. I am an attorney duly licensed to practice law in the State of Nevada and am the Owner  
6 of Riklis Law, PLLC counsel of record to Plaintiffs Christopher J. Hadnagy and Social-Engineer,  
7 LLC in the above-referenced matter. I have personal knowledge of the matters stated herein and  
8 would be competent to testify to them if called to do so.

9 2. This Declaration is made in support of Plaintiffs' Response in Opposition to  
10 Defendants' Motion to Transfer.

11 3. True and correct printouts of screenshots of the "FAQ" Section of Defendants' Website  
12 at <https://defcon.org/html/links/dc-faq/dc-faq.html> (accessed October 15, 2023) are attached hereto  
13 as "Exhibit 1."

14 4. True and correct printouts of screenshots of the "Forums" Section of Defendants'  
15 Website at <https://forum.defcon.org> (accessed October 15, 2023) are attached hereto as "Exhibit  
16 2." Clicking on the "Def Con Forums" link on Def Con's "Home" page located on Page 12 leads  
17 to Page 13, which shows all the forums for Def Con Planning. Clicking on the "Def Con 31  
18 Planning" link leads to a page with all of the Sub-Forums dedicated to all of Def Con's activities.

19 5. True and correct printouts of screenshots of the "Book a Room" section of Defendants'  
20 Website at <https://defcon.org> (accessed October 15, 2023) are attached hereto as "Exhibit 3."  
21 Clicking on the "Book a Room!" link on the "Home" page located on Page 23 leads to Pages 24-  
22 25, which shows all the hospitality room blocks reserved for Def Con 2024. Clicking on the date  
23 range shows the "Event Dates" as seen on Page 25. Clicking on "Search" brings up the various  
24 hotel options seen on pages 26-30.

25 6. True and correct printouts of screenshots of the link to the "Open Calls" and Style Guide  
26 Section of Defendants' Website at <https://defcon.org> (accessed October 15, 2023) are attached  
27 hereto as "Exhibit 4." Clicking on the "Open Calls" link on the "Home" page located on Page 33  
28 leads to Page 34, which shows all the different "Calls" applicable to the Event. For example,

1 Clicking on the “Call for Exhibitors” provides real-time information as to the acceptance period of  
 2 the calls and provides in-depth information on how to contribute in various methods at the Event  
 3 on Pages 35-38.

4       7. True and correct printouts of screenshots of the link to the “Press Archives” Section of  
 5 Defendants’ Website at [https://defcon.org/html/links/dc-press/dc\\_press.html](https://defcon.org/html/links/dc-press/dc_press.html) (accessed October 9,  
 6 2023) are attached hereto as “Exhibit 5.” Reviewing the extensive archives located at that url  
 7 address, Page 51 shows a link to an article by Politico entitled: “For U.S. officials, the world’s  
 8 largest hacking conference isn’t all fun and games.” Clicking on that link leads to the attached  
 9 article on Pages 41-49.

10       8. True and correct printouts of screenshots of the “Def Con Shoot” Forum on Defendants’  
 11 website at <https://forum.defcon.org/node/244825> (accessed on October 29, 2023) and links to  
 12 Defendants’ web page at [https://deviating.net/firearms/defcon\\_shoot/](https://deviating.net/firearms/defcon_shoot/) (accessed on October 29,  
 13 2023) are attached hereto as “Exhibit 6”. Clicking on “THE UNOFFICIAL DEF CON SHOOT”  
 14 link on the “Forums” page located on Page 16 leads to Pages 54-55, which shows all the various  
 15 Forums for the Def Con Shoot on the Website. Clicking on “THE UNOFFICIAL DEF CON  
 16 SHOOT” link on Page 54 leads to the Forum shown on Pages 56-57. Clicking on the  
 17 “deviating.net” link on Page 56 leads to the additional published guides on Pages 58-61.

18       9. True and correct printouts of screenshots of the home page of Defendants’ Website at  
 19 <https://defcon.org/> (accessed October 28, 2023) are attached hereto as “Exhibit 7.”

20       10. True and correct printouts of screenshots of the X (formerly Twitter) accounts of  
 21 Defendants (accessed October 29, 2023) are attached hereto as “Exhibit 8.” Mr. Moss’ X account  
 22 is “@thedarktangent” and Def Con Communications, Inc.’s X account is “@defcon”. On October  
 23 29, 2023, I visited each of the enumerated URL addresses on the attached posts which are hosted  
 24 on [twitter.com](https://twitter.com); I captured the screenshots enumerated as Pages 65-83 at that time.

25       11. True and correct printouts of screenshots of the link to the “Archives By Show”  
 26 Section of Defendants’ Website at <https://defcon.org> (accessed October 17, 2023) are attached  
 27 hereto as “Exhibit 9.” Clicking on the “Archives By Show” link on the “Home” page located on  
 28 Page 85 leads to Pages 86-95.

1       12. True and correct printouts of screenshots of the link to the “Goons” Section of  
2 Defendants’ Website at <https://defcon.org> (accessed October 17, 2023) are attached hereto as  
3 “Exhibit 10.” Clicking on the “Goons” link on the “Home” page located on Page 97 leads to Pages  
4 98-132, which shows various of the Goons.

5       13. True and correct printouts of screenshots of the Washington Secretary of State’s  
6 Corporations and Charities Filing System at <https://ccfs.sos.wa.gov> (accessed on October 28,  
7 2023) and <http://JeffMcnamaralaw.com/contact/> (accessed on October 28, 2023) are attached  
8 hereto as “Exhibit 11”.

9       14. True and correct printouts of screenshots of the link to the “Contact” Section of  
10 Defendants’ Website at <https://defcon.org> (accessed October 17, 2023) are attached hereto as  
11 “Exhibit 12.” Clicking on the “Contact” link on the “Home” page located on Page 140 leads to  
12 Page 141.

13       15. A true and correct printouts of screenshots of the commercial website  
14 <https://sessionize.com/maxie-reynolds> (accessed October 29, 2023) and [LinkedIn.com](https://www.linkedin.com) (accessed  
15 October 29, 2023) are attached hereto as “Exhibit 13.” On October 29, 2023, I visited the  
16 enumerated URL addresses on the attached websites; I captured the screenshots enumerated as  
17 Pages 143-146.

18       16. Each page of Defendants’ website at [www.defcon.org](http://www.defcon.org) bear a copyright notation of  
19 either “© 1992-2023 Def Con Communications, Inc. All Rights Reserved” or “(r) DEF CON  
20 Communications, Inc. and each screenshot exhibits the related URL. These are included on the  
21 last page of the exhibits.

22       17. After further investigation into the matter, Plaintiffs are informed and believe that  
23 there are several individuals and entities with discoverable facts that Plaintiffs wish to identify as  
24 witnesses. They are as follows:

25           a. Marc Rogers, who is believed to have discoverable knowledge related to  
26 security measures taken at the annual Def Con event in Las Vegas, Nevada.  
27 Plaintiffs are informed and believe that he is located in California.  
28           b. Billy Boatright, who is believed to have discoverable knowledge related to Mr.

1 Hadnagy's character, and is believed to have attended the annual Def Con event  
2 every year that Mr. Hadnagy did. Plaintiffs are informed and believe that he is  
3 located in Clark County, Nevada.

4 c. Black Hat USA, which is an entity believed to have discoverable knowledge  
5 related to Defendants' communications with them pertaining to the underlying  
6 defamatory statements of fact. Pursuant to Black Hat USA's online presence,  
7 Plaintiffs are informed and believe that they are located in California and Nevada.

8 I declare under penalty of perjury that the foregoing is true and correct.

9  
10 DATED: October 30, 2023  
11  
12

13 /s/ Kristofer Riklis  
14 Kristofer Riklis  
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**CERTIFICATE OF SERVICE**

I, Kristofer Riklis, hereby certify that the foregoing:

**DECLARATION OF KRISTOFER RIKLIS, ESQ. IN SUPPORT OF  
PLAINTIFFS' RESPONSE IN OPPOSITION TO DEFENDANTS' MOTION TO  
TRANSFER VENUE [ECF NO. 15]**

was submitted electronically for filing and/or service with the United States District Court, District of Nevada's e-filing system on the 30th day of October, 2023. Electronic service of the foregoing document was be made in accordance with the E-Service List as follows:

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I further certify that I served a copy of this document by mailing a true and correct copy thereof, postage prepaid, addressed to: N/A

/s/ Kristofer Riklis  
KRISTOFER RIKLIS, Esq.